

July 12 2005

The Honorable Charles Terreni Interim Executive Director South Carolina Public Service Commission Post Office Drawer 11649 Columbia, South Carolina 29211

Re:

South Carolina Public Service Commission

Docket No. 2005-191-E

Dear Mr. Terreni:

Enclosed are the original and ten (10) copies of Carolina Power & Light Company, d/b/a/ Progress Energy Carolinas, Inc.'s Petition to Intervene in the above-referenced docket. All parties have been served in accordance with the attached Certificate of Service.

Sincerely,

Len S. Anthony

Deputy General Counsel-Regulatory Affairs

LSA:mhm

Enclosures

c: All parties of record

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Raleigh, NC 27602

## STATE OF SOUTH CAROLINA

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

## **DOCKET NO. 2005-191-E**

In the Matter of	)		W
Generic Proceeding to Explore a Formal	)	CAROLINA POWER & LIGHT	2
Request For Proposal For Utilities That	)	COMPANY, d/b/a PROGRESS	÷,
Are Considering Alternatives for Adding Generating Capacity	)	ENERGY CAROLINAS, INC.'S PETITION TO INTERVENE	Ë

NOW COMES, Carolina Power & Light Company, d/b/a Progress Energy Carolinas, Inc. ("PEC"), pursuant to Public Service Commission of South Carolina ("the Commission") Rules 103-830 and 103-836, and petitions the Commission to enter an order permitting it to intervene and fully participate in the above captioned proceeding. In support thereof, PEC shows the following:

- 1. PEC is an electric utility organized, existing and operating under the laws of the State of North Carolina, authorized to do business in South Carolina, for the purposes of generating, transmitting, distributing and selling electric power in its service territory in North and South Carolina. Its principal office is located at 410 South Wilmington Street, Post Office Box 1551, Raleigh, North Carolina 27602.
- 2. The attorneys for PEC, to whom all communications and pleadings should be addressed are:

Len S. Anthony Kendal Bowman Progress Energy Service Company, LLC Post Office Box 1551 Raleigh, North Carolina 27602 Telephone: (919) 546-6367

3. By Order No. 2005-2, in Docket No. 2004-178-E (SCE&G's last rate case), at the request of Columbia Energy, LLC (a subsidiary of Calpine Corporation), the Commission decided to open a generic proceeding to explore the electric utilities' of South Carolina resource acquisition processes. On June 24, 2005, the Commission opened such a docket.

4. As an electric utility serving a portion of South Carolina, PEC has a substantial interest in the subject matter of this proceeding.

WHEREFORE, PEC respectfully requests the Commission to enter an order:

- 1. Allowing it to intervene and fully participate in the above captioned proceeding and to otherwise exercise all statutory rights provided to intervenors under South Carolina law.
- 2. Adopting such positions concerning the substantial matters at issue in the above captioned proceeding as PEC may argue and present to the Commission.
- 3. Awarding PEC such other and further relief as the Commission may deem just and proper.

Respectfully submitted this the 12th day of July, 2005.

PROGRESS ENERGY CAROLINAS, INC.

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Len S. Anthony

Kendal Bowman

Associate General Counsel

Post Office Box 1551

Raleigh, North Carolina 27602-1551

Telephone: (919) 546-6367

## **CERTIFICATE OF SERVICE**

I, Len S. Anthony, hereby certify that I have this day served a copy of Progress Energy Carolinas, Inc.'s Petition to Intervene in SCPSC Docket No. 2005-191-E, by depositing in the United States mail, first-class postage prepaid, on the following:

Florence Belser Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211

This the 12th day of July, 2005.

PROGRESS ENERGY CAROLINAS, INC.

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